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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHUBO ZHANG,

Plaintiff,

v.

ALEJANDRO MAYORKAS, Secretary,
Department of Homeland Security, *et al.*,

Defendants.

C 3:23-cv-04494 LJC

**STIPULATION TO EXTEND TIME WITHIN
WHICH DEFENDANTS MUST FILE A
RESPONSE AND ORDER**

The parties, through their undersigned attorneys, hereby stipulate to an extension of time within which the Defendants must serve the answer or otherwise respond in the above-entitled action.

Defendants will file their response on or before January 16, 2024.

The parties further request a corresponding extension on the deadline for filing a summary judgment motion under the Court's Immigration Mandamus Procedural Order. Currently, if Plaintiff has not filed a motion for summary judgment by 90 days after the Complaint was filed, or November 28, 2023, Defendants must file a motion for summary judgment by 120 days after the Complaint was served, or January 16, 2024. In light of the agreed-upon extension for Defendants' response to the Complaint, the parties request that, if Plaintiff has not filed a motion for summary

1 judgment by January 29, 2024, Defendants must file their motion for summary judgment by
2 March 18, 2024. In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
3 signatories listed herein concur in the filing of this document.

4 Dated: November 17, 2023

Respectfully submitted,

5 ISMAIL J. RAMSEY
6 United States Attorney

7 /s/ Elizabeth D. Kurlan
8 ELIZABETH D. KURLAN
9 Assistant United States Attorney
Attorneys for Defendants

10 Dated: November 17, 2023

11 /s/ Eric Martin
12 ERIC MARTIN
13 Attorney for Plaintiff

14 **ORDER**

15 Pursuant to stipulation, IT IS SO ORDERED.

16 Date: November 20, 2023

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18 LISA J. CISNEROS
19 United States Magistrate Judge
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DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On August 30, 2023, Plaintiff filed a complaint in which she brings a mandamus action seeking adjudication of her Form I-130, Petition for Alien Relative. *See* Dkt. No. 1. Our office was served with the complaint on September 18, 2023.

3. On November 2, 2023, I contacted Plaintiff regarding Defendants' request for an additional extension of time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: November 16, 2023

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN

Assistant United States Attorney